

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PURDUE PHARMA L.P.,)	
PURDUE PHARMACEUTICALS L.P.,)	
THE P.F. LABORATORIES, INC. and)	
GRÜNENTHAL GmbH,)	
)	
Plaintiffs,)	C.A. No. 15-687-GMS
)	(Consolidated)
v.)	
)	
ALVOGEN PINE BROOK, LLC, and)	
ACTAVIS LABORATORIES FL, INC.,)	
)	
Defendants.)	

**STIPULATION AND ORDER TO EXTEND TIME
SOLELY TO ACCOMMODATE NOTICED FACT DEPOSITIONS**

WHEREAS, on November 18, 2015, the Court entered a Scheduling Order in the above-captioned case (D.I. 22);

WHEREAS, the Court entered deadlines for the close of fact and expert discovery (D.I. 22 at ¶ 6);

WHEREAS, the parties have noticed numerous fact depositions pursuant to Rules 30(b)(6) and 30(b)(1) of the Federal Rules of Civil Procedure, and have worked to schedule those depositions;

WHEREAS, the parties have met and conferred, and believe that a limited extension to the case schedule is warranted solely to accommodate the noticed fact depositions;

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, subject to the approval of the Court, that the Scheduling Order (D.I. 22) is amended as follows:

1. The deadlines relating to fact discovery and expert discovery shall be extended as reflected in the table below.

Event	Current Deadline	New Deadline
Close of fact discovery	Feb. 9	Mar. 2
Opening expert reports on which party has burden of proof	Mar. 23	Apr. 7
Rebuttal expert reports	Apr. 21	May 16
Reply expert reports	May 12	June 6
Close of expert discovery	June 30	July 21

2. Except as provided below, the parties agree that the revised schedule is intended solely to accommodate the depositions that have already been noticed in the above-captioned case. Accordingly, no new written discovery shall be served. The parties further agree that, other than the depositions that have already been noticed, no further depositions will be noticed and no depositions of additional witnesses or follow-up depositions of noticed witnesses will be permitted unless at least one of the following conditions are satisfied:

- a) A witness designated under Rule 30(b)(6) is not sufficiently prepared to testify as required by the Federal Rules of Civil Procedure.
- b) A witness, during his or her deposition, identifies another individual not subject to a deposition notice as having responsive, non-privileged, relevant, and non-cumulative knowledge.

3. All other provisions of the Court's Scheduling Order (D.I. 22) as entered on November 20, 2015, and all other orders in the lead case C.A. No. 15-687-GMS (consolidated) shall otherwise remain in full force and effect.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith, II

Jack B. Blumenfeld (#1014)
Rodger D. Smith II (#3778)
1201 North Market Street, P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
rsmith@mnat.com

*Attorneys for Purdue Pharma L.P., Purdue
Pharmaceuticals L.P., The P.F. Laboratories,
Inc. and Grünenthal GmbH*

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert M. Vrana

Melanie K. Sharp (#2501)
Robert M. Vrana (#5666)
1000 North King Street
Wilmington, DE 19801
(302) 571-6681
msharp@ycst.com
rvrana@ycst.com

Attorneys for Actavis Laboratories FL, Inc.

HEYMAN ENERIO GATTUSO & HIRZEL LLP

/s/ Dominick T. Gattuso

Dominick T. Gattuso (#3630)
300 Delaware Ave., Suite 200
Wilmington, DE 19801
(302) 472-7300
dgattuso@hegh.law

*Attorneys for Defendant Alvogen Pine Brook,
LLC*

SO ORDERED this 8th day of February 2017.


United States District Judge